

RECEIVED

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
20TH DIVISION

APR 04 2023

U.S. District Court
Middle District of TN

VAUGHN HARRIS

(Name)

578087

(Prison Id. No.)

All Pretrial and Inmate Prisoners
Held In the RHU cells of

The Davidson County - Downtown
Detention Center, PRISON

(Prison Id. No.) - unknown

Plaintiff(s)

v. The Metropolitan Government
of Nashville and Davidson County,
Tennessee, and the D.C.S.O. staff, and
The D.C.S.O. Medical Care Agents,
Correct Care Solutions and Dr Africa,
And 3 other Dentist

Defendant(s)

(List the names of all the plaintiffs filing
this lawsuit. Do not use "et al." Attach
additional sheets if necessary.)

Civil Action No. _____

(To be assigned by the Clerk's Office.
Do not write in this space.)

JURY TRIAL REQUESTED ☒ YES ☒ NO

(List the names of all defendants
against whom you are filing this
lawsuit. Do you use "et al." Attach
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS FILED
PURSUANT TO 42 U.S.C. § 1983

I. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

- Name of the first plaintiff: VAUGHN HARRIS
Prison I.D. No. of the first plaintiff: 578087
Address of the first plaintiff: D.C.S.O. PRISON, P.O. Box 196383,
Nashville, TN 37219 (Downtown Detention Center Prison)

Status of Plaintiff: CONVICTED (☒) PRETRIAL DETAINEE (☒)

- Name of the second plaintiff: ALL Pretrial and Posttrial D.C.S.O. +
Prison I.D. No. of the second plaintiff: unknown (Requested)
Address of the second plaintiff: D.C.S.O. PRISON, P.O. Box 196383
Nashville, TN 37219 (Downtown Detention Center Prison)

Status of Plaintiff: CONVICTED (☒) PRETRIAL DETAINEE (☒)

(Include the name of the institution and mailing address with zip code for each plaintiff. If any plaintiff changes his or her address, he or she must notify the Court immediately. If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.)

B. Defendant(s) against whom this lawsuit is being brought: ⁽¹⁾ The Metropolitan ⁽²⁾ Government of Nashville and Davidson County, Tennessee, and the

1. Name of the first defendant: Nashville, Tennessee Legislative
 Place of employment of the first defendant: Tennessee State Capital Bldg.
1st Floor, 600 Charlotte Ave, Nashville, TN 37243
 First defendant's address: Tennessee State Capital Bldg. 1st Floor,
600 Charlotte Ave, Nashville, TN 37243

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

2. Name of the second defendant: ^{3rd Defendant} Governor Bill Lee DARON HALL Sheriff of D.C.S.O.
THOMAS CONRAD, (CARLA Joseph)
 Place of employment of the second defendant: THE D.C.S.O. DOWNTOWN
Detention Center Prison, 200 James Robertson Pkwy, Nashville, TN 37201
 Second defendant's address: 200 James Robertson Pkwy, Nashville, TN
37201 or D.C.S.O. P.O. Box 196383, Nashville, TN 37219

All defendants are being sued in both capacities below:

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

5TH
GERANVISSE
EARL

(If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, his or her place of employment, address, and the capacity in which you are suing that defendant. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide each defendant's proper name, place of employment, and address, the Clerk will be unable to serve that defendant should process issue.)

II. JURISDICTION

- A. Jurisdiction is asserted pursuant to 42 U.S.C. § 1983 (applies to state prisoners).
 - Jurisdiction is also invoked pursuant to 28 U.S.C. § 1343(a)(3).

If you wish to assert jurisdiction under different or additional statutes, you may list them below: under 42 U.S.C. § 1985

THESE ARE THE DEFENDANTS TO THIS LAWSUIT FILED BY VALERIE HARRIS, SUIT DEFENDANTS LISTED BELOW AND ON NEXT PAGES AGAINST METRO GOVT. 5/16

1. The Metropolitan Government of Nashville and Davidson County, Tennessee (pg 28)
2. City of Nashville, Tennessee 26. JAMIE JOHNSON 28. DARON HALL-SHERIFF
3. Correct Care Solutions 27. RUBY JOYNER 29. C. ROBINSON
4. MELINDA STEPHENS 28. TYLER SAGGS 50. E. HIGGINS
5. DR KRISTAL LEWIS 29. ~~PATRYCE MAYBERRY~~ 51. JACOB BIANCHI
6. JENNY JAYNES 30. ~~J. PRINCE~~ 52. JENNIFER COBBS
7. TOM WEBB 31. AUSTIN DALE 53. A. BUCHANAN
8. JEANETTE PAGE 32. T. HINDSLEY 54. MELISSA HICKS
9. JAN REBAR 33. CLARK SARGENT 55. RUTLEDGE
10. AARON CASKEY 34. SEAN BEACH 56. CORRECT CARE SOLUTIONS MEDICAL AGENTS
11. MICHELLE RAGLAND 35. M. GRAULAU 98. AND EMPLOYEES AND STAFF - ETC...
12. APRIL MCQUEEN 36. M. HEDGWOOD 92. REVENUE SHAVON
13. LOREENA WILLIAMS 37. ANNALISA SMITH 97. CANDY HILL
14. JEFF (LAST NAME UNKNOWN) 38. NICHOLAS PALLAK 98. DR AFRICA
15. Austin Bodie 39. DAVID BRYANT 100. C. MACKAY
16. DARON HALL-SHERIFF 40. THOMAS CONRAD 98 thru 130
17. CATHERINE FITZWATER 41. JERRY RAMSEY Some Names will
18. KENITA THOMAS 42. RICHARD GRANT have to be discovered
19. ~~M. JONES~~ 43. DIAL by plaintiff's legal counsel
20. JUSTIN WEBB 44. S. PRICE because the defendants
21. KEIANA BURGESS 45. SARA VARDELL would hide their NAMES
22. BRIAN EICHSTADT 46. A. BIGGS MANY TIMES UNDER
23. RONNIE DAVIS 47. JAMES HENDRY "METRO" CUSTOM.
24. DEBRA DIXON 48. MICHAEL MARTINEZ D.C.S.O. P.O. Box 19635
25. GRAYSE EARL 49. CHRIS BROWN Nashville, TN 37217

56 thru 98 DAVIDSON COUNTY SHERIFFS OFFICE PRETRIAL PRISON MEDICAL AGENTS EMPLOYED IN ASSISTANCE BY CORRECT CARE SOLUTIONS FOR THE DAVIDSON COUNTY

ALL defendants are being sued in their individual and official capacities. All are employees or agents of the Davidson County Sheriff's Office, 447 2nd Ave North, Nashville, TN 37201, or D.C.S.O. - 20 MEDICAL AGENTS EMPLOYED BY THE D.C.S.O. AND METRO. by Correct Care Solutions, 1283 MURFREESBORO ROAD, SUITE 500, NASHVILLE, TN 37217, AND DR. Krystal Lewis and Jenny Jaynes - Dentle Care Agents of Correct Care Solutions, 2023 FOR THE METRO. DAVIDSON COUNTY SHERIFFS OFFICE. PRETRIAL PRISON FROM 2014 thru 2019. ALL CAN BE GIVEN SUMMONS AT THE DAVIDSON COUNTY SHERIFFS OFFICE PRETRIAL PRISON OR CORRECT CARE SOLUTIONS FOR ANY OF THE MEDICAL OR DENTLE CARE EMPLOYEES OR AGENTS. 98 thru 120. All other EMPLOYEES OR AGENTS OF METRO or the D.C.S.O.

III. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuit(s) in the United States District Court for the Middle District of Tennessee, or in any other federal or state court? ☒ Yes ☐ No

B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs VAUGHN HARRIS

Defendants DAVIDSON COUNTY SHERIFF'S OFFICE STAFF and Medical Agents

2. In what court did you file the previous lawsuit? Federal-Middle District of Tennessee

(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)

** IN state Court I Filed 3 Criminal Appeals.*

3. What was the case number of the previous lawsuit? 3:15cv00356

4. What was the Judge's name to whom the case was assigned? Judge Sharp

5. What type of case was it (for example, habeas corpus or civil rights action)? Civil Rights

6. When did you file the previous lawsuit? (Provide the year, if you do not know the exact date.) 2015

7. What was the result of the previous lawsuit? For example, was the case dismissed or appealed, or is it still pending? Dismissed For Failure to HAVE Adequate Responses due to inadequate Access time to Law Library Research Materials For Access to Court.

8. When was the previous lawsuit decided by the court? (Provide the year, if you do not know the exact date.) _____

9. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit? ☒ Yes ☒ No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

IV. EXHAUSTION

A. Are the facts of your lawsuit related to your present confinement?

☒ Yes ☐ No

B. If you checked the box marked "No" in question III.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain. DAVIDSON
COUNTY, TENNESSEE DOWNTOWN DETENTION CENTER PRISON AND PRETRIAL
JAIL - 200 JAMES ROBERTSON PARKWAY, NASHVILLE, TN 37201

C. Do the facts of your lawsuit relate to your confinement in a Tennessee state prison?

☒ Yes ☐ No

(If you checked the box marked "No," proceed to question IV.G. If you checked the box marked "Yes," proceed to question IV.D.)

D. Have you presented these facts to the prison authorities through the state grievance procedure? ☒ Yes ☐ No

E. If you checked the box marked "Yes" in question III.D above:

1. What steps did you take? I exhausted the Grievance Process
FOR MORE THAN 10 YEARS.

2. What was the response of prison authorities? TO LIE AND DENY THE
CIVIL RIGHTS VIOLATIONS.

F. If you checked the box marked "No" in question IV.D above, explain why not. N/A

G. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)? ☒ Yes ☐ No

H. If "Yes" to the question above, have you presented these facts to the authorities who operate the detention facility? ☒ Yes ☐ No

I. If you checked the box marked "Yes" in question III.H above:

1. What steps did you take? I mailed a letter to the Mayor and
Governor and Exhausted the Grievance Process of the Prison.

52-1

2. What was the response of the authorities who run the detention facility? They Lied and claimed my GRIEVANCES were False or unsustained.

- J. If you checked the box marked "No" in question IV.H above, explain why not. N/A

V. CAUSE OF ACTION

Briefly explain which of your constitutional rights were violated:

My 1st Amendment U.S.C. Right to Adequate Access to Courts. Bounds v. Smith, 430 U.S. 812 (1977)
And my 8th and 14th Amendment U.S.C. Right to timely medical repair and treatment
and my 4th, 5th, and 6th Amendment U.S.C. Rights to the U.S. Constitution.

VI. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 1/2 inch x 11 inch paper. Write on one side only, and leave a 1-inch margin on all 4 sides.

I, VAUGHN HARRIS, AM IN IMMINENT DANGER OF PHYSICAL INJURY BY MEDICAL NEGLIGENCE! So
THIS LAWSUIT is filed by I, VAUGHN HARRIS, A Nashville, TN
prisoner of the Downtown Detention Center Prison, under 42 U.S.C.
§§ 1983 and 1985 AGAINST the Metropolitan Government of Nashville
and Davidson County, Tennessee, Governor Bill Lee, the Tennessee le-
gisature, Sheriff Daron Hall, and all Davidson County Sheriff's Office Staff
and Medical Agents that assisted in the violation of my 1st, 4th, 5th, 6th, and 14th
Amendment U.S. Constitution Rights, I was entitled to under U.S. Constitution Law.
This LAWSUIT filed by I, VAUGHN HARRIS, AGAINST METRO-Nashville, Ten-
nessee under 42 U.S.C. §§ 1983 and 1985 ask for Monetary damages and
injunctive relief be given to the plaintiff under 42 U.S.C. §§ 1983 and 1985
from the defendants, for the defendants denial of giving me sick call
requested dentle and medical care procedures to the plaintiff due to
unjust discrimination by the medical staff, for the defendants denying
Access and use of Law Library materials, legal assistance, and printouts of case
WON AGAINST Metro-Nashville to the D.C.S.O. staff. CRIMINAL APPEALS WON AGAINST TENN.
For Access and response to Court, which creates a denial of access to Court in
violation of Bounds v. Smith, 430 U.S. 812, 828 (1977) and Lewis v. Casey, 116 S.Ct. 2
and Saucier v. Katz, 533 U.S. (2001).

INTRODUCTION OF SUIT WITH JURY DEMAND

5/1/8

THIS IS A CIVIL RIGHTS LAWSUIT ACTION FILED BY I, VAUGHN HARRIS, A state prisoner of Nashville, Tennessee, demanding damages of up to \$250,000.00 and injunctive relief under 42 U.S.C. § 1983 and 1985, alleging denial of timely requested medical and dentle ^{REPAIR} care and excessive use of force in violation of the 4TH, 5TH, 8TH and 14TH Amendments to the United States Constitution and Tennessee state Law. AND ALSO I ALLEGE THAT I WAS HELD IN R.H.U. UNIT FOR (more than 2 years under) EXTRA RUNITIVE CONFINEMENT segregation and denied ~~adequate~~ ^{TIME} USE OF LAW LIBRARY study materials and study time due to ^{METRO. AND D.C.S.D.} staff policy, discrimination, and violation of ~~my~~ Due Process Clause of the 14TH ^{RIGHTS} Amendment of the U.S. Constitution. I ALSO ALLEGE THAT ALL the defendants working in the Davidson County Criminal Justice System conspired in a joint effort to deny me, VAUGHN HARRIS, my 1ST, 2ND, 4TH, 5TH, 6TH, 8TH and 14TH Amendment Rights of the U.S. Constitution, that I was entitled to, but was denied by persons working under color of illegal state LAW, T.C.A. 29-20-205.

★ MOTION ASKING THE COURT FOR CERTIFICATION OF THE CLASS ★
IN THIS LAWSUIT: THE CLASS CONSIST OF ALL PRISONERS HELD IN DAVIDSON COUNTY SHERIFF'S OFFICE RESTRICTIVE HOUSING UNITS (R.H.U.) IN NASHVILLE, TENNESSEE PRISONS AND THE DOWNTOWN DETENTION CENTER PRISON - 4TH FLOOR AND ANY OTHER FLOORS AT THE D.C. AND ALL PRISONERS WHO ARE OR WILL BE CONFINED BY THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY, TENNESSEE AND THE D.C.S.O: PRISONS DEPARTMENT - DISCIPLINARY UNITS

★ I, VAUGHN HARRIS, the plaintiff, AM IN IMMINENT DANGER OF PHYSICAL HARM OR DEATH due to the defendants Acts of deliberate ^{MEDICAL} ~~NEGLECT~~ and indifference to my Medical Health and Dentle Health, Federal Court Please Accept this LAWSUIT CASE! ★

The U.S. Federal District Court for the Middle District of Tennessee has jurisdiction over the plaintiff's claims of violation of his federal U.S. Constitutional Rights under 42 U.S.C. 99/1983 and 1985, 42 U.S.C. 99/1331(c)(1) and 1343 and state law tort claims under 28 U.S.C. 91367.

This is a Pro Se ^{or} CLASS ACTION Lawsuit CLAIM ACTION filed by I, VAUGHN HARRIS, under 42 U.S.C. 99/1983 and 1985 against the Metropolitan Government of Nashville and Davidson County, Tennessee and the Davidson County Sheriff's Office staff, employees, and medical and dentle agents, for punitive, compensatory, monetary, and injunctive relief damages for the defendants execution of Nashville municipal policy and law Tenn. Code Annotated 29-20-205, that allows the defendants to violate the plaintiff's 1st, 4th, 5th, 8th, and 14th Amendment Rights of the U.S. Constitution, that the plaintiff's were entitled to, but was denied by persons working under color of state law. The defendants executed these Constitutional violations under Tenn. Code Ann. 29-20-205, law ^{that allowed by city of medical agents to deny suppressions and gave} denial and delay of urgent medical and dentle care, ^{to deny suppressions and gave} malpractice medical care, ^{to deny suppressions and gave} deliberate indifference to dentle care by ^{to deny suppressions and gave} denying fillings and denial of medical requested effective, preventive procedures, discrimination of use of ^{to deny suppressions and gave} LAW Library ^{study} Tablet use, time, and access and apps, ^{to deny suppressions and gave} phone use to non disciplinary inmates held in R.H.U., inmates not under D.C.S.O., disciplinary ^{HARRING} punishment being held in R.H.U. and being denied equal ^{HARRING} use of General Population Tablets, ^{extrajudicially} allowed assault and battery of already body chained inmates by D.C.S.O. staff, ^{allowed} mental health staff ^{to torture} inmates by taking all their clothes and putting them in extra cold cells, inmates verbal request and written request for mental health care are discriminated against by bias and racist mental health staff, and allowed the D.C.S.O. staff to hinder, alter, and destroy ^{my D.C.S.O.} prisoner inmate plaintiff documents put in D.C.S.O. mail to the U.S. Federal Tennessee Court illegally.

^{AND} This is a class action lawsuit/claim action filed by I, VAUGHN HARRIS, ON NASHVILLE, METRO.

This lawsuit is filed by I, VAUGHN HARRIS, Pro se under 42 U.S.C. § 1983 325

1. This is a United States Constitution Rights Legal suit claim

action for relief filed by I, VAUGHN HARRIS, A pro-se pre-trial prisoner of Nashville, Tennessee from 10-29-2014 to

2019 of today, for \$250,000.00 in punitive, compensatory, and

injunctive relief damages from the defendants, Tennessee, the municipality of the Metropolitan Government of Nashville and Davidson County, Tennessee, the Davidson County Sheriff's Office Administrators

and staff, and its medical care agents, Correct Care Solutions, and its medical staff, and its dentle agents, DR Krystal Lewis,

AND JENNY JAYNES, for injuries I suffered and still suffer due

to the defendants willful, wanton, gross neglect ^{MEDICAL + DENTLE DELAY} AND denial of ^{REQUESTED AND APREScribed} (reasonable foreseeable) adequate dentle, and

medical care from 10-29-2014 to today in 2019, which violated

my 8TH AND 14TH Amendment Rights to the United States Constitution, that I was entitled to, but was denied by persons working

under color of (Tennessee) state LAW; TN. Code Ann. 29-20-205(1) & (2) that violates the United States Constitution and was the municipality

policy that was executed by "Metro." and its agents to cause my injuries of assault and battery ^{AND GROSS NEGLIGENCE} AND medical willful, wanton, neglect

which removes ^{METRO.} governmental entities (suit immunity under LAW, TENN. Code Annotated § 29-20-201(b)(2)). The U.S. Federal District Court

for the Middle District of Tennessee has jurisdiction over my legal claims of violations of my federal constitutional rights under

42 U.S.C. § 1983 and 42 U.S.C. §§ 1331(1) and 1343; and my state LAW tort claims under 28 U.S.C. § 1367. All tortfeasors are being sued

under 42 U.S.C. § 1983 in their official and individual capacities.

2. I, VAUGHN HARRIS, was entitled to my 8TH AND 14TH AMENDMENT U.S.C. RIGHTS by LAW, ^{LEGAL AND}

3. I demand \$250,000.00 be paid jointly and severally by all tortfeasors and defendants that assisted and caused my painful UNNECESSARY DENTLE AND MEDICAL GROSS NEGLECT AND TORTURE, AND DISCRIMINATION

The U.S. Federal Court for the Middle District of Tennessee has jurisdiction over the plaintiffs' claims of violation of federal constitutional rights under 42 U.S.C. § 1983 and 42 U.S.C. § 1331(1) and 1343, it also has supplemental jurisdiction over the plaintiffs' state law tort claims under 28 U.S.C. § 1367.

This is ~~a class action and an individual lawsuit claim action~~ filed by I, VAUGHN HARRIS, and on behalf of all pretrial prisoners injured by the Metropolitan Government of Nashville and Davidson County, Tennessee and the Davidson County Sheriff's Office employees, staff, and agents execution of the municipality's policy, custom, and law, (Tennessee Code Annotated) that caused us injuries ~~2002~~ for \$250,000.00 in damages for Harris 29-20-205, from 2014 to today of ~~2014~~ AND until these injuries are redressed by the court in ^{COMPARATIVE FAULT PRINCIPLE REQUESTED} punitive, compensatory, and injunctive relief damages, under 42 U.S.C. § 1983 to the plaintiff, ^{ALL} pretrial prisoners, for the defendants' ^{plaintiff 1st, 5th, and 14th} deliberate violation of our First, Fifth, and Fourteenth Amendment Rights of United States ^{RIGHTS} Consitution, we were entitled to, but were denied by persons working under ^{ENTITIES} color of state law. ^{HARRIS IS SUEING FOR \$250,000.00 IN PUNITIVE AND COMPENSATORY DAMAGES FROM ALL DEFENDANTS JOINTLY AND SEVERALLY AND JOINTLY IN CONJUNCTION WITH OTHER CLASS MEMBERS ON BEHALF OF HIS CASE.}

Therefore we the plaintiffs seek these damages in demand from the defendants all made parties to the suit: That the ^{CRIMINAL ON HARRIS} case 2011-D-3945 be ruled time served or dismissed whatever the case number is now. (2) That the defendants immediately arrange a dentle referral to a cosmetic dentle doctor or dentle restoration specialist and allow that dentist to repair as much of HARRIS's teeth as possible with rootcanals, fillings, and replacements due to Dr. Lewis's delay. (3) Have all defendants that carried out abuse against pretrial detainee prisoner, VAUGHN HARRIS, pay jointly \$250,000.00 or whatever amount HARRIS sued for. (4) AS punitive and compensatory damages to HARRIS. (4) Release HARRIS from prison on pretrial prison with the monetary damages put on two cashiers checks - one for \$3000 and the other for the balance of the court awarded amount ^{to HARRIS} as he is released. (5) Order the Federal Government to take over running and supervision of the Davidson County Sheriff's Office prisons for the next 10 years. (6) Award whatever injury damages all other pretrial prisoners are entitled to in conjunction with me, HARRIS. (7) Expunge all of HARRIS's disciplinary convictions from the Davidson County Sheriff's Office and its staff. (8) Have the Court use comparative fault principles when making all the defendants pay damages to HARRIS for the abuse they inflicted against VAUGHN HARRIS or made HARRIS sustain by neglect, abuse, and torture by omission of medical care or assault and battery.

The U.S. Federal District Court for the Middle District of Tennessee has jurisdiction over the plaintiff's claims of violation of federal constitutional rights under 42 U.S.C. § 1983 AND 42 U.S.C. § 1331(c) AND 1343. And this same Federal District Court of Middle Tennessee has ^(SUPPLEMENTAL) jurisdiction over the plaintiff's state law tort claims under 28 U.S.C. § 1367. This suit is filed against all parties execution of law, policy, and custom, Tennessee Code Annotated 29-20-205, against the plaintiffs that caused unnecessary injuries and torture and punishment violation of their civil, constitutional rights. ^{retroactive} This is a ~~class action~~ AND INDIVIDUAL lawsuit claim action, filed by I, VAUGHN HARRIS, ^{FOR \$250,000.00} ^{injured} AGAINST the Metropolitan Government of Nashville and Davidson County, Tennessee, from 2014 to today of 2023 AND the Davidson County Sheriff's Office ^{EMPLOYEES OF THE} prison, for compensatory, punitive, AND injunctive relief damages under 42 U.S.C. § 1983, for deliberate delay, denial, AND neglect of providing timely, requested, prescribed, notified, medical care AND law library materials to I, Harris, AND other pretrial ^{AND} prisoners in their custody, in violation of our first, fifth, and fourteenth Amendment Rights of the United States Constitution, we were entitled to under the Due Process Clause of the fourteenth Amendment of the United States Constitution, but were denied by persons and entities working under color of state law. Also we plaintiffs allege and claim torts of assault and battery, ^{AND} deliberate denial AND delay of being given timely medical care by the defendants under municipality policy, custom, AND LAW, ^(Tennessee Code Annotated) 29-20-205, in violation of our same Due Process Rights of the fourteenth Amendment of the United States Constitution, we were entitled to, but were denied by persons and entities working under color of state law. ^{REQUESTED:} Therefore, I, VAUGHN HARRIS, request that the court ^{GRANT} the following ^{DAMAGES} ^{relief} to I, Harris: (1) Issue an injunction ordering the defendants to immediately arrange for the plaintiff to be given all restorative denture treatment needed after I, Harris am referred to another cosmetic dentist or denture agent restoration specialist. (2) Issue an order to have all named defendants guilty of deliberate abuse, pay punitive and compensatory comparative, fault damages to the plaintiff of \$250,000.00 for the physical and emotional damages I sustained from the defendants abuse. (3) Have the Federal United States Government take over the running of this prison for 10 years. (4) Issue an injunction order AND declaratory judgment order stating that my rights were violated by the defendants AND that they all named parties have to pay all awarded monetary damages jointly and severally to I and other plaintiffs using comparative fault principles to pay us plaintiffs. (5) ~~Issue the~~ Court order that the pending case for me, VAUGHN HARRIS, be Dismissed on the grounds of violation of Due Process AND illegal injury, torture, and punishment before conviction, case number 2011-D-3475. (6) Award punitive and compensatory damages to all other plaintiffs in relief they are entitled to.

This is A United States Constitution Federal ^{AND STATE} Prisoner
 Rights Medical and Dentle Injuries Lawsuit CLAIM ACTION
 FOR RELIEF DAMAGES, filed by I, VAUGHN HARRIS, A Pro Se
 pretrial prisoner of the Metropolitan Government of
 Nashville and Davidson County, Tennessee or the Municipality
 Metro. Nashville, TN., from 10-1-2014 to today of 2018, for
 \$250,000⁰⁰ in punitive and compensatory and injunctive
 relief damages from the defendants, Metro. Nashville
 and Davidson County, TN, the Municipality, the Metropolitan
 Government of Nashville and Davidson County, Tennessee, the Metro.
 Davidson County Sheriff's Office staff and administrators, and the Metro.
 D.C.S.O. Agents of Medical Care, Correct Care Solutions, and the C.P.S.
 medical staff and dentle agents (Names Listed on Next PAGE),
 for UNNECESSARY injuries AND ASSAULT AND BATTERY ^{GROSS} PAIN AND
 Torture infliction by denial of timely, reasonable, foreseeable,
 AND prescribed Adequate ^{TREATMENT} medical AND dentle to me, HARRIS, by the
 defendants under Metro. Nashville, TN. ^(UNCONSTITUTIONAL) MUNICIPALITY policy AND
 directive, Tenn. Code Annotated 29-20-205(1), (2), + (6), that Let the Metro.
 Nashville, TN. Municipality and its ^{DENTLE} medical agents ignore my ^{WRITTEN} (request)
 for ^{TOOTH FILLING} medical care ^{TEETH CAVITY} AND my ^{TEETH} serious medical needs, which Let the
 dentist refuse to fill my ^{Teeth} cavities, (I caused ^{Teeth} bitten in D.C.S.O. food for
 4 months until my teeth deteriorated to the nerves, the Dr. Krystal Lewis left
 me in dentle pain for 8 months - ^{BY NOT} instead of referring me for a requested
^{I WAS SUFFERING UNBEOARABLE PAIN, AND WANTED TO SAVE MY TEETH} teeth root canal, that could be authorized, the Correct Care Solutions medical
 staff retaliated against me by conspiring to deny me dentle pain meds
 for 8 months with the Metro. D.C.S.O. Administrator - Austin Bodie, ^{LATER} ON ANOTHER
 date the C.P.S. medical staff withheld my proscribed high blood pressure
 medication to make me suffer a heart attack, ^{EVEN AFTER I NOTIFIED THEM} after oral surgery by a
^{HOSPITAL} Meharry dentist - the C.P.S. medical staff refused to give me ANY PAIN
 medication for a week - ^{AFTER ORAL SURGERY AT VANDERBILT} IN RETALIATION for my medical Lawsuit against
 Metro. Nashville, TN and its D.C.S.O. Agents and its C.P.S. medical Agents.

I, VAUGHN HARRIS, the plaintiff in this (LAW) repeatedly exhausted the D.C.S.O. grievance appeal procedures when possible to the defendants, but sometimes the defendants withheld access to the appeal devices by denying us R.H.U. held inmates (USE) of the TABLETS and (INMATE KIOSK) From 4-21-2020 until today in 2023.

① The defendants in this lawsuit are: the Metropolitan Government of Nashville and Davidson County, Tennessee, Governor Bill Lee, the Nashville, Tennessee Legislature, Sheriff Daron Hall, Austin Bodie, Thomas Conrad, GRANVISSE EARL, Beth Gentav, CARLA Joseph, 98 thru 130. ALL other unknown named D.C.S.O. ADMINISTRATIVE staff of the Davidson County Sheriff's Office and its Medical Agents and Dentist from 2014 until today of 2023. (Because the defendants HIDE their NAME BADGES in order to IMPEDED ME FROM FILING A NONTRIVOLOUS MEDICAL CARE AND LAW DENIAL OF RESEARCH ADEQUATE USE Lawsuit from 2014 until today of 3-11-2023).

I, HARRIS, put a 60 plus page lawsuit into the Davidson County Sheriff's Office MAIL BOX in March of 2022 and an amended suit in April 2022, suing the above named persons and the Metropolitan Government of Nashville, Tennessee and its Agents in the lawsuit, but these defendants were never named by the courts in the lawsuits filed to the court. Because the lawsuits I, VAUGHN HARRIS, placed in the D.C.S.O. mailbox in March, April, and May of 2022 to the U.S. Federal Court of Tennessee Middle District were altered, amended, and destroyed by the D.C.S.O. staff under Tenn. Code Ann. 29-26-205, in order to cause injury AND dismissal of my Nontrivoluminous Lawsuit claim, and to hinder AND IMPEDED ME access to the court. Which violated my 1ST, 4TH, 5TH, 8TH, and 14TH Amendment Rights of the U.S. Constitution, I was entitled to, but was denied by persons working under color of state law. An actual injury occurs where the effort of a prisoner to pursue a Nontrivoluminous legal claim was hindered or prevented from litigating a case. → Lewis

Supreme Court case *Lewis v. Casey*, 116 S.Ct. 2174, 2179 (1996)⁽⁴⁾ stated that a prisoner must show a denial of access to court, not a denial of access to a law library or legal assistance, in order to claim a denial of court access. Also a prisoner could show that the inadequacies in the prison's law library or assistance program or assistance ^{LAW LIBRARY HELD ON} hindered his efforts to pursue a ^{NON FRIVOLOUS} legal claim and an actual injury resulted ⁽⁴⁾ or an actual injury occurs where the effort of a prisoner to pursue a non-frivolous legal claim was hindered or has been frustrated or was impeded by the ^{prison} defendants or the ^{prison} municipality by ^{denied} access to the Federal Court, (5), or (6) if a prisoner's complaint is dismissed because the individual was unable to research pleading requirements or unable to file a ^{MAILED} complaint or a nonfrivolous complaint, a hinderance has occurred, (7). Some Courts (8) assume that only dismissal or inability to file nonfrivolous complaints satisfies the injury requirement, *Lewis v. Casey*, 116 S.Ct. (5) at 2180, (6) at 2181, (7) at 2189, (8) *Davis v. Milwaukee Co.* 225 F.Supp.2d 967 (E.D. Wis. 2002).

Since 2011 through up to today March of 2023 and on going currently this instant I, inmate prisoner VAUGHN HARRIS, have been denied effective timely medical and dentle treatment and repair of my sickcall requested serious medical needs by Davidson County Sheriff's Office Medical and Dentle care contracted staff agents for inmate pretrial and posttrial prisoners because of these D.C.S.O. Medical Agents execution of Nashville, Tennessee law and D.C.S.O. policy and custom T.C.A. 29-20-205. All of the denied medical care and dentle repair care D.C.S.O. - C.C.S. sickcall request and D.C.S.O. grievances and appeals to the denied sickcalls, and the Medical and Dentle (Dr ^{Doctor} diagnosis) of my serious medical needs is documented in the D.C.S.O. defendants computer files and the Medical and Dentle Agents for the D.C.S.O. (Correct Care Solutions, Dr Krystal Lewis, Dr B < NAME UNKNOWN, Dr AFRICA < Full Name Unknown, Dr ^{NAME} UNKNOWN, etc...) paper and computer files.

5/10

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(5) The institution or prosecution of any judicial or administrative proceeding, even if malicious or without probable cause;

(6) Misrepresentation by an employee whether or not such is negligent or intentional;

(7) Or results from riots, unlawful assemblies, public demonstrations, mob violence and civil disturbances;

(8) Or in connection with the assessment, levy or collection of taxes; or

(9) Or in connection with any failure occurring before January 1, 2005, which is caused directly or indirectly by the failure of computer software or any device containing a computer processor to accurately or properly recognize, calculate, display, sort, or otherwise process dates or times, if, and only if, the failure or malfunction causing the loss was unforeseeable or if the failure or malfunction causing the loss was foreseeable but a reasonable plan or design or both for identifying and preventing the failure or malfunction was adopted and reasonably implemented complying with generally accepted computer and information system design standards. Notwithstanding any other law, nothing in this subdivision (9) shall in any way limit the liability of a third party, direct or indirect, who is negligent. Further, a person who is injured by the negligence of a third party contractor, direct or indirect, shall have a cause of action against the contractor.

★ Tennessee LAW ~~TN~~ Code Ann. § 29-20-205(2) CLAIMS THAT ^{2 of 2} INJURIES THAT ARISE OUT OF CIVIL RIGHTS VIOLATIONS CARRIED OUT BY ITS STAFF AND EMPLOYEES AND AGENTS, IS LEGAL AND THAT ALL THESE PERSONS AND GOVERNMENTAL ENTITIES ARE IMMUNE TO THE RIGHTS OF THE UNITED STATES CONSTITUTION FOR CITIZENS OF TENNESSEE, WHICH IS A LIE AND UNCONSTITUTIONAL. THIS GOVERNMENT POLICY INFLECTED MY INJURIES BY ITS AGENTS EXECUTION OF THIS UNCONSTITUTIONAL POLICY AND CUSTOM.

[A] local government may not be sued under § 1983 for an injury inflicted solely by its employees or agents. Instead, (it is when execution of a government's policy or custom, whether made by its lawmakers or by those whose edicts or acts may fairly be said to represent official policy, inflicts the injury that the government as an entity is responsible under § 1983.)

UNCONSTITUTIONAL
GOVERNMENT
LAW
AND
POLICY

29-20-205(2)

★ 1 A municipality is not liable under § 1983 for [9] injuries inflicted solely by its employees or agents, and the doctrine of respondeat superior is inapplicable to § 1983 actions. *Id.* at 694-695. "It is only when the 'execution of the government's policy or custom ... inflicts the injury' that the municipality may be held liable under § 1983." *City of Canton v. Harris*, 489 U.S. 378, 385, 103 L. Ed. 2d 412, 109 S. Ct. 1197 (1989) (citation omitted).

2 of 2
19

The defendants, the Metropolitan Government of Nashville and Davidson County, Tennessee and its employees and agents, adopted and executed law, policy, and custom, Tennessee Code Annotated 29-20-205, ^{CIVIL RIGHTS} (legalized abuse) of pretrial prisoners in the municipality's custody to inflict harm, punishment, and injury to our pretrial prisoners ^{ANY INHABITANTS OF NASHVILLE, TENNESSEE AND I} in any manner of ^{ABUSE OF} discretion by it and its employees and its agents under the municipality's policy, custom, law, and direction. Which was the moving force behind the municipality's and its employees and agents deliberate indifference to our pretrial prisoners' health and safety and caused the medical agents to carry out assault and battery by medical care delay, neglect, and denial of medical care and ^{INFLECT} unnecessary injury and infliction of ^{PAIN AND TORTURE} on us plaintiffs. The municipality's agents and employees of the Davidson County Sheriff's Office also used law (Tenn. Code Ann. 29-20-205) to withhold ^{EQUAL (USE OR)} adequate access to adequate Federal Law Library materials ^{LEGAL TABLET} to us pretrial prisoners from 2015 to 2019, so we could not file a nonfrivolous lawsuit complaint and redress and respond to the Court in a meaningful timely manner with adequate legal council. The plaintiffs seek to hold the City of Nashville, Tennessee and its employees and medical care agents liable for injuries caused by it and its agents and employees execution of policy, custom, and law (Tenn. Code Annotated 29-20-205) against ^{IN CUSTODY} pretrial prisoners of Metro. Nashville, Tennessee that suffered injuries due to ^{CONSTITUTIONAL} violations of these plaintiffs' Due Process Clause rights and violations of their 1st, 4th, 5th, 8th, and 14th Amendment Rights of the United States Constitution, by persons working under color of state law of Nashville, Tennessee from 2015 until today of 2019 and possibly into the future. Local governing bodies can be sued under 42 U.S.C. § 1983 only where "the action that is alleged to be unconstitutional implements or executes a policy statement, ordinance, regulation, or decision officially adopted and promulgated by that body's officers, (agents, or employees and the municipality) or is visited pursuant to governmental custom even though such a custom has received formal approval through decision making channels. *Monell v. Department of Social Services*, 436 U.S. 658, 690-91, 98 S.Ct. 2018, 56 L. Ed. 2d 611 (1978). A municipality can be liable under 42 U.S.C. § 1983 only where its policies are the moving force behind the constitutional violation and there is a direct causal connection between the policy, custom, or law of the city and the constitutional injury to the plaintiffs. ^{VAUGHN HARRIS} (quoting *City of Canton v. Harris*, 489 U.S. 378, 389, 703 L. Ed. 2d 412, 109 S.Ct. 1197 (1989)).

5/12

5/12

The Municipality of Metropolitan Nashville and Davidson County, Tennessee's Adoption of the city's official policy, custom, and law, Tenn. Code Ann. 29-20-205(2)(1) is an illegal legislative enactment of law that ^{states} ~~claims~~ that ^{entities} ~~governmental~~ employees of medical care are allowed to ignore or ^{abuse} ~~violate~~ inhabitants of Nashville, TN civil rights or federal U.S. 8th and 14th Amendment Rights of the United States Constitution, I was entitled to, but was denied by persons working under color of Tenn. Code Ann. 29-20-205(1)(2)(6), Metro. Nashville, TN. state law. It is only when the execution of the government's policy or custom inflicts the injury that the municipality may be held liable under 42 U.S.C. § 1983, City of Canton, Ohio v. Harris, 489 U.S. 378, 385, 103 L. Ed. 2d 412, 109 S. Ct. 1197 (1989) (citation omitted). All the unnecessary injuries I, Harris suffered and sustained from Metro. and its Agents were a direct result of Metro. Nashville, TN official municipal policy and custom and law Tenn. Code Ann. 29-20-205(1), (2), and (6), used by these ^(medical) Agents to deny me ^{timely} medical care, by the discretionary ^(abuse) clause, 29-20-205(1) and the civil rights immunity clause, (2) of 29-20-205; that they knew I needed, but refused to give me for the very purpose of causing me, Harris, ^{and others} ~~harm~~ or assault and battery by ^{deliberate} medical neglect, with the knowledge that harm would result, even though they all knew I had a sufficiently serious medical need while (incarcerated) Farmer v. Brennan, 511 U.S. 825, 837, 128 L. Ed. 2d 811, 114 S. Ct. 1970 (1994) and showing the prison medical staff possessed a sufficiently culpable state of mind in denying me medical care for the very purpose of ^{injury or to me} ~~causing harm~~ or with the knowledge ^{injury or} ~~harm~~ will result, (Farmer 511 U.S. at 834, 835) The act of deliberate indifference by prison officials to ^{inmate's} ~~inmate's~~ detainees' serious medical needs constitutes unnecessary and wanton infliction of pain in violation of the 8th and 14th of the U.S.C. ^{due} ~~process~~ prohibition against cruel and unusual punishment, ^{ESTELLE V. GAMBLE 429 U.S. 97, 104, 50 L. Ed. 2d 251, 97 S. Ct. 285 (1976)} ~~MOLTON V. CITY OF CLEVELAND 839 F.2d 246, 243 (6th Cir 1988)~~ where any person acting under color of state law abridges rights secured by the Constitution or United States laws, including a detainee's 8th and 14th Amendment rights. § 1983 provides civil redress, City of Canton, Ohio v. Harris, 489 U.S. 378, 388-89, 103 L. Ed. 2d 412, 109 S. Ct. 1197 (1989)

Because the municipality, the Metropolitan Government of Nashville and Davidson County, Tennessee adopted a policy, custom, and law ^(TENN. CODE ANN. 29-20-205) that caused our plaintiffs ^{MINDFULY AND} mistreatment and was the moving force behind the constitutional violations inflicted upon us pretrial prisoners of Nashville ^{the city held} from 2015 to 2019 of today, the municipality (and its agents) can be liable under 42 U.S.C. § 1983 only where its policies are the moving force (behind) the constitutional violation. *City of Canton v. Harris*, 489 U.S. 378, 389, 103 L. Ed. 2d 412, 109 S. Ct. 1197 (1989) (quoting *Monell v. New York City Dept. of Social Services*, 436 U.S. 658, 647, 56 L. Ed. 2d 611, 98 S. Ct. 2018 (1978)). The policy, custom, and law ^(TENN. CODE ANN. 29-20-205) abuse adopted, authorized, and made executed by the Metropolitan Government ^(CITY) of Nashville and Davidson County, Tennessee and its agent employees and agent medical contractors and staff under the municipality's direction to cause our plaintiff injuries from deliberate indifference actions ^{deliberate} by the municipality and its agents, abuse that caused constitutional violations of rights ^{exposed} entitled to us pretrial prisoner detainees of Nashville, Tennessee from 2015 to today 2019, ^{by persons working under color of state law}. A municipality can be liable for failure to train, supervise, or discipline its law enforcement employees and agents for acts or inactions that constitute a policy or custom of deliberate indifference to pretrial prisoners' health or safety that cause injuries in violation of ^{our} ^{15th, 14th, and 8th Rights of the} ^{and} Amendment United States Constitution Rights under 42 U.S.C. § 1983. *Sharpe v. City of Lewisburg, Tenn.*, 677 F. Supp. 1362, 1368 (M.D. TENN. 1988) and *Leach v. Shelby County Sheriff*, 891 F.2d 1241 (6th Cir. 1989). It is possible that a city or municipality ^{may} be held liable in conjunction with its employees and agents for execution or decisions ^{acts or} carrying out the municipality's policy, custom, or law ^(TENN. CODE ANN. 29-20-205) that ^(CONSTITUTES) condones deliberate indifference to pretrial prisoners' serious medical needs or other ^(purposely) punishment of the Due Process Clause of the plaintiffs' 1st, 4th, 5th, 8th, and 14th Amendments of the United States Constitution were violated by the municipality and its employees and agents, the defendants, under municipality state law. The touchstone of a 42 U.S.C. § 1983 action against a government body is an allegation that official policy or law is responsible for the staff and agents and municipality deprivation of rights protected by the constitution. This ^(NASHVILLE, TENN. CODE ANN. 29-20-205) municipality policy of abuse of constitutional law was executed against us pretrial prisoners of the City of Nashville to violate our 1st, 4th, 5th, 8th, and 14th Amendment Rights of the United States Constitution and injured our health and violated the statute of limitations ^{law} of prosecution of their abuse by impeding access to the court by withheld adequate legal materials ^{law} from us plaintiffs for years from 2015 until today of 2019 under Tenn. Code Ann. 29-20-205 by the metro. b.c.s.d. municipality and its employees.

(D.C.S.O. = Davidson County Sheriff's Office)

VII. Relief Requested Immediately From The Federal Court:

p 6A

(1) Court Order that prisoner, Vaughn Harris - 578087, be given A D.C.S.O. LAW and Entertainment Tablet with all the apps that general population inmates are allowed and order he be given 365 day ^{per year} use of that Tablet 24 Hours a day except when the Tablet is being recharged one day out of the 7 days in a week.

(2) Court Order that prisoner, VAUGHN Harris, be sent to an outside of prison dentle care cosmetic and implant dentist to recieve dentle debryment, dentle fillings, dentle root canals, dentle ^{WHITENING} crowns, and dentle teeth ^{implants or} replacements at SAME DAY SMILES.COM or CLEAR CHOICE DENTLE

(3) Court Order that VAUGHN Harris be given (2 days for 1 day served ^{SENTENCE credits}) on and in his sentenced time served and to be served due to the defendants DENIAL of Harris's 1ST, 4TH, 5TH, 6TH, 8TH, and 11TH Amendment Rights of the U.S. Constitution, that he was entitled to, but was denied by persons working under color of Tennessee state law in violation of Harris's Due Process Rights.

(4) Court Order the D.C.S.O. Sheriff and Head Administrative Assistant WARREN THOMAS CONRAD to appoint a LAW LIBRARIAN or a D.C.S.O. Case Manager to make computer ^{pages} (printouts) of the Case LAW stored on the D.C.S.O. LAW Library Tablet if written, verble, or digital requested by ANY ^{D.C.S.O.} prisoners at ANY Nashville, Tennessee prison.

(5) Court Order the D.C.S.O. Sheriff and the D.C.S.O. Food Buyer and staff to provide real pasteurized homogenized cow 2% Reduced Fat Milk to all D.C.S.O. inmates on Kosher diets every day at Breakfast with Cereal for the next 14 years from 2023 to 2037.

(10) Court Order the D.C.S.O. Sheriff to have the ^{D.C.S.O.} LAW LIBRARIAN and Case Manager Supervisor (Gravisse Earl) to put all Federal Civil Lawsuits won by Tennessee prisoners or persons against the D.C.S.O. staff for the Metropolitan Government of Nashville and Davidson County, Tennessee

(17) Court Order that the D.C.S.O. Sheriff or Gravisse Earl to give inmate VAUGHN Harris the Full Names and staff positions of all D.C.S.O. guards and

Agents From 1/1/2020 to 3/31/2023, All D.C.S.O. Medical and Dentle Care Staff and Agents

⑧ Court Order that the defendants and the D.C.S.O. Sheriff Daron Hall order GRANVISSE EARL and LAW Librarian Mrs Bourne and the Educational Director of the D.C.S.O. and the Securus Tablet agent programmer to put all of the (INMATE WON CIVIL CASES) ^{ANY OF} UNPUBLISHED LAWSUITS WON AGAINST ^{Nashville, Tenn.} TENNESSEE GOVERNMENT, Tennessee Medical and Dentle Agents, Nashville, Tennessee D.C.S.O. staff or Medical Agents FROM date 1-1-1984 to 2023 on the Securus LAW Library Tablet immediately under the Freedom of Information Act of the U.S.A., Also order that (D.C.S.O. inmates) be allowed paper printouts of these cases CASE LAW by verble or written request or digital Tablet request, AND have put on the LAW Library Tablet instructions on how to File Habeas Corpus Petitions AND Examples of some → filed and won by Tennessee or other state prisoners for Due Process Violations;

⑨ Court Order a Federal Investigator to examine the LAW Library Research Tablet use time for inmates housed in the entire D.C.S.O. - Downtown Detention Center Prison

→ D.C.S.D. = Davidson County Sheriff's Office Prison & BELOW
VII. RELIEF REQUESTED: State exactly what you want the Court to order each defendant to do for you. I Request THE FEDERAL Court Judge to

- ① Court Order The (defendants) to Alter the T.C.A. LAW 29-20-205 use,
- ② Court Order the D.C.S.D. Sheriff and all his D.C.S.D. staff to allow inmates held in R.H.U. but are Not under Disciplinary Hearing EXTRA Punishment to be allowed 7 day a week all apps Tablet use in their cells,
- ③ Court Order that all inmates held in D.C.S.D. R.H.U. units be allowed 4 Hour 3 day a week use of the LAW Library Tablet and the radio App and CASE LAW PRINTOUTS of the Tablet's CASE LAW by the LAW Librarian, Educational director, or Case Manager, AND
- ④ Court Order the D.C.S.D. SHERIFF DARRIN HALL and the D.C.S.D. Medical CARE Supervisor to immediately get the D.C.S.D. Medical staff to give inmate VAUGHN HARRIS 98865
- ⑤ Court Order the D.C.S.D. Medical Agent Doctor give VAUGHN HARRIS the correct Blood Pressure medicine regiment of Liprilic in the morning and Liprilic in the evening as needed,

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: Vaughn Harris Date: MARCH 14, 2023
Prison Id. No. 578087
Address (Include the city, state and zip code.): Downtown Detention Center Prison,
P.O. Box 196383, Nashville, TN 37219-6383

Signature: _____ Date: _____
Prison Id. No. _____
Address (Include the city, state and zip code.): _____

ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT, and provide the information requested above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison Identification numbers, and addresses.

ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS, if not paying the civil filing fee.

SUBMIT THE COMPLAINT AND (1) THE REQUIRED FILING FEE OR (2) COMPLETED APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES AND COSTS TOGETHER. Complaints received without the required filing fee or application to proceed without prepayment of fees will be returned. Filing fees and applications to proceed without prepayment of fees submitted without a complaint will be returned.